

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

**In the matter of Telecommunications
Relay Services and Speech to Speech
Services for Individuals with Hearing
And Speech Disabilities**

**CC Docket No. 98-67
CG Docket No. 03-123**

**California Coalition of Agencies Serving the Deaf and Hard of Hearing Comments
in Support of Petition Seeking Clarification Filed by Ultratec, Inc., Sprint
Corporation, and Hamilton Relay, Inc.**

The California Coalition of Agencies Serving the Deaf and Hard of Hearing (Coalition),¹ supports the Request for Clarification,² filed on December 7, 2004, by Ultratec, Inc., Sprint Corporation, and Hamilton Relay, Inc. (Petitioners) seeking clarification that a two-line voice carryover (VCO) service called two-line captioned telephone VCO service is a form of telecommunications relay service (TRS) eligible for reimbursement from the Interstate TRS Fund.

Since the Commission already has determined single line captioned telephone to be an enhanced VCO service that is reimbursable under the FCC's rules,³ and has mandated two-line VCO is a feature of TRS,⁴ it makes sense to allow reimbursement for two-line captioned telephone VCO. Allowing reimbursement is fully consistent with the

¹ The Coalition consists of eight community-based nonprofit agencies providing various social services to deaf and hard-of-hearing Californians – Deaf Counseling, Advocacy and Referral Agency; Greater Los Angeles Agency on Deafness; Northern California Center on Deafness; Deaf and Hard of Hearing Service Center; Orange County Deaf Equal Access Foundation; Tri-County GLAD; Center on Deafness – Inland Empire; Deaf Community Services of San Diego – and the California Association of the Deaf, a statewide membership organization representing deaf consumers.

² See Ultratec, Inc., Sprint Corporation, and Hamilton Relay, Inc., *Request for Clarification*, CC Dkt. No. 98-67 and CG Dkt. No. 03-123, filed December 7, 2004.

³ *In the Matter of Telecommunications Services and Speech-to-Speech Services for Individuals with Disabilities*, Declaratory Ruling, CC Dkt. No. 98-67, FCC 03-190 at ¶16 (2003). Specifically, the Commission concluded that captioned telephone is an innovative way to provide VCO.

⁴ *In the Matter of Telecommunications Services and Speech-to-Speech Services for Individuals with Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, CC Dkt. 98-67, CG Dkt. No. 03-123, FCC 03-112 at ¶¶27,29 (2003)

Commission's mandate to make new telecommunications technologies available to people with disabilities.

The Coalition agrees with the Petitioners that two-line captioned telephone VCO provides access to the telephone network that is even more functionally equivalent to conventional voice telephone services than is possible with one-line captioned telephone, as it allows, as pointed out by Petitioners, direct access to 911 emergency dispatchers, inbound direct dialing, use of call waiting and forwarding, shared line and initiation of three-way and conference calls. The ability to initiate or terminate captioning during calls is also a bonus and should result in captioning cost efficiencies.

The Coalition is particularly impressed with the benefits of two-line captioned telephone VCO in the workplace. Because of the passage of the Americans with Disabilities Act in 1990, deaf and hard-of-hearing people participate more fully in daily life in the United States. More deaf and hard-of-hearing people are employed and participate in the business world, and more of them communicate using the telephone system because of the relay services mandated by the ADA and the Commission's implementing regulations. However, TRS, including two-line VCO or single line captioned telephone still has its limitations and transparency issues, particularly for inbound calls. Most jobs that require the use of the telephone include the need to respond to calls from co-workers within the same business or agency or from clients, customers or others. This presents problems with traditional TRS but not with two-line captioned telephone VCO. The ability to answer calls directly dialed to the two-lined captioned telephone is an important benefit that will reduce employment barriers for users of this service, resulting in greater job opportunities for them. For those deaf individuals who

can take advantage of VCO, two-line captioned telephone VCO comes closest to being “functionally equivalent” to conventional voice telephone services and thus allowing TRS providers reimbursement for their costs for this service is fully consistent with the ADA.

The Commission should clarify that two-line captioned telephone VCO service is a form of TRS eligible for reimbursement from the Interstate TRS Fund.

Dated: January 6, 2005

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Kresse', with a long horizontal flourish extending to the right.

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